

FILED

JUL 21 2021

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

U.S. DISTRICT COURT-WVND
MARTINSBURG, WV 25401

UNITED STATES OF AMERICA,

v.

TYRONE GREENFIELD, aka "Tidy,"
JEROME CHRISTOPHER WINECOFF,
aka "Q,"
ANTOINE PAUL BROWN,
HOPE JULIA CLEMONS,
JENNIFER LYNN DICK,
MARCUS PURNELL, aka "Mo,"
CHARLES GRANT, JR.,
BRANDON DALE BENJAMIN,
MATTHEW CRIMM,
SAMUEL CURTIS TAYLOR,
CRAIG ORNDOFF, and
SEAN AMOS ROBINSON, aka "Zoo."

Criminal No.

3:21CR35

Violations:

18 U.S.C. § 371
18 U.S.C. § 922(a)(6)
18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(a)(2)
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 843(b)
21 U.S.C. § 843(d)
21 U.S.C. § 846

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy)

1. From on or about April 1, 2019, to on or about December 31, 2020, in Berkeley County, in the Northern District of West Virginia and elsewhere, the defendants **TYRONE GREENFIELD, aka "Tidy," JEROME CHRISTOPHER WINECOFF, aka "Q," ANTOINE PAUL BROWN, HOPE JULIA CLEMONS, and JENNIFER LYNN DICK** unlawfully, knowingly and willfully did combine, conspire, confederate and agree together with each other

and with other persons to commit an offenses against the United States, to wit, to purchase, possess, and transfer firearms to persons prohibited from possessing firearms, in violation of the Gun Control Act, Title 18, United States Code, Sections 922(a), 922(g), and 924(a).

MANNER & MEANS

2. It was a part of the conspiracy that Defendants **ANTOINE PAUL BROWN**, **HOPE JULIA CLEMONS**, and **JENNIFER LYNN DICK**, would purchase firearms from Federal Firearms Licensees (“FFLs”) in Berkeley County, West Virginia.

3. Defendants **ANTOINE PAUL BROWN**, **HOPE JULIA CLEMONS**, and **JENNIFER LYNN DICK**, would purchase firearms and complete the ATF Form 4473 averring that they were the true purchaser of the firearms.

4. After Defendants **ANTOINE PAUL BROWN**, **HOPE JULIA CLEMONS**, and **JENNIFER LYNN DICK**, purchased and acquired firearms, they would transfer the firearms to others, including defendants **TYRONE GREENFIELD**, aka “Tidy,” and **JEROME CHRISTOPHER WINECOFF**, aka “Q,” in exchange for United States currency.

OVERT ACTS

5. In furtherance of the conspiracy and to effect the objects of the conspiracy the following overt acts, among others, were committed in the Northern District of West Virginia and elsewhere:

- a. On or about April 11, 2019, in Berkeley County, in the Northern District of West Virginia, defendant **ANTOINE PAUL BROWN**, in connection with the acquisition of a firearm, that is, a Taurus, Model G2C, 9mm pistol, bearing serial number TLY96930, from a licensed dealer of firearms within the meaning of Chapter 44, Title

18, United States Code (referred to as a FFL), knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **ANTOINE PAUL BROWN** under chapter 44 of Title 18, in that the defendant represented he was the actual purchaser of the firearm, when in fact, he was not the true purchaser of the firearm;

- b. On or about April 11, 2019, in Berkeley County, in the Northern District of West Virginia, defendant **TYRONE GREENFIELD, aka "Tidy,"** knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, that is, the felony offense of Conspiracy to Distribute and Possession with Intent to Distribute Marijuana, in violation of 21 U.S.C. §§ 841(a)(1) and 846, in the United States District Court of the District of Columbia in case Number 97-260-01, did knowingly possess a Taurus, Model G2C, 9mm pistol, bearing serial number TLY96930, said firearm having been shipped and transported in interstate commerce;
- c. On or about April 24, 2019, in Berkeley County, in the Northern District of West Virginia, defendant **ANTOINE PAUL BROWN**, in connection with the acquisition of firearms that is a Taurus, Model G2C, 9mm pistol, bearing serial number TMC87419 and a Taurus, Model G2C, .40 caliber pistol, bearing serial number SMB50731, from a FFL, knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **ANTOINE PAUL BROWN**

- under chapter 44 of Title 18, in that the defendant represented he was the actual purchaser of the firearms, when in fact, he was not the true purchaser of the firearms;
- d. On or about May 13, 2019, in Berkeley County, in the Northern District of West Virginia, defendant **ANTOINE PAUL BROWN**, in connection with the acquisition of a firearm, that is, a Taurus, Model G2C, 9mm pistol, bearing serial number TLW81109, from a FFL, knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **ANTOINE PAUL BROWN** under chapter 44 of Title 18, in that the defendant represented he was the actual purchaser of the firearm, when in fact, he was not the true purchaser of the firearm;
- e. On or about May 13, 2019, in Berkeley County, in the Northern District of West Virginia, defendant **TYRONE GREENFIELD, aka "Tidy,"** knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, that is, the felony offense of Conspiracy to Distribute and Possession with Intent to Distribute Marijuana, in violation of 21 U.S.C. §§ 841(a)(1) and 846, in the United States District Court of the District of Columbia in case Number 97-260-01, did knowingly possess a Taurus, Model G2C, 9mm pistol, serial number TLW81109, said firearm having been shipped and transported in interstate commerce;
- f. On or about July 23, 2019, in Berkeley County, in the Northern District of West Virginia, defendant **ANTOINE PAUL BROWN**, in connection with the acquisition of a firearm, that is, a Taurus, Model G2C, 9mm pistol, bearing serial number

TMA81872, from a FFL, knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **ANTOINE PAUL BROWN** under chapter 44 of Title 18, in that the defendant represented he was the actual purchaser of the firearm, when in fact, he was not the true purchaser of the firearm;

- g. On or about July 23, 2019, in Berkeley County, in the Northern District of West Virginia, defendant **TYRONE GREENFIELD, aka "Tidy,"** knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, that is, the felony offense of Conspiracy to Distribute and Possession with Intent to Distribute Marijuana, in violation of 21 U.S.C. §§ 841(a)(1) and 846, in the United States District Court of the District of Columbia in case Number 97-260-01, did knowingly possess a Taurus, Model G2C, 9mm pistol, bearing serial number TMA81872, said firearm having been shipped and transported in interstate commerce;
- h. On or about September 29, 2019, in Berkeley County, in the Northern District of West Virginia, defendant **ANTOINE PAUL BROWN**, in connection with the acquisition of a firearm, that is, a Taurus, Model G2C, 9mm pistol, bearing serial number SMS45201, from a FFL, knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **ANTOINE PAUL BROWN** under chapter 44 of Title 18, in that the defendant represented he was the

actual purchaser of the firearm, when in fact, he was not the true purchaser of the firearm;

- i. On or about October 16, 2019, in Berkeley County, in the Northern District of West Virginia, defendant **HOPE JULIA CLEMONS**, in connection with the acquisition of firearms, that is, a Taurus, Model G2C, 9mm pistol, bearing serial number TMS71722, and an Anderson Manufacturing, Model AM-15, .300 caliber blackout, bearing serial number 18164147, from a FFL, knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearms to defendant **HOPE JULIA CLEMONS** under chapter 44 of Title 18, in that the defendant represented she was the actual purchaser of the firearm, when in fact, she was not the true purchaser of the firearm;
- j. On or about October 17, 2019, in Berkeley County, in the Northern District of West Virginia, defendant **HOPE JULIA CLEMONS**, in connection with the acquisition of firearms, that is, a Taurus, Model G2C, 9mm pistol, bearing serial number TMU05548, and a Taurus, Model G3, 9mm pistol, bearing serial number TMU16862, from a FFL, knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearms to defendant **HOPE JULIA CLEMONS** under chapter 44 of Title 18, in that the defendant represented she was the actual purchaser of the firearm, when in fact, she was not the true purchaser of the firearm;

- k. On or about February 29, 2020, in Berkeley County, in the Northern District of West Virginia, defendant **ANTOINE PAUL BROWN**, in connection with the acquisition of a firearm, that is, a Taurus, Model G3, 9mm pistol, bearing serial number AAM162163, from a FFL, knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **ANTOINE PAUL BROWN** under chapter 44 of Title 18, in that the defendant represented he was the actual purchaser of the firearm, when in fact, he was not the true purchaser of the firearm;
- l. On or about March 17, 2020, in Berkeley County, in the Northern District of West Virginia, defendant **ANTOINE PAUL BROWN**, in connection with the acquisition of a firearm, that is, a Taurus, Model G2C, 9mm pistol, bearing serial number TMW8007, from a FFL, knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **ANTOINE PAUL BROWN** under chapter 44 of Title 18, in that the defendant represented he was the actual purchaser of the firearm, when in fact, he was not the true purchaser of the firearm;
- m. On or about March 24, 2020, in Berkeley County, in the Northern District of West Virginia, defendant **ANTOINE PAUL BROWN**, in connection with the acquisition of a firearm, that is, a Taurus, Model PT111, 9mm pistol, bearing serial number TWA21487, from a FFL, knowingly made a false and fictitious written statement to a

FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **ANTOINE PAUL BROWN** under chapter 44 of Title 18, in that the defendant represented he was the actual purchaser of the firearm, when in fact, he was not the true purchaser of the firearm;

- n. On or about March 24, 2020, in Berkeley County, in the Northern District of West Virginia, defendant **JEROME CHRISTOPHER WINECOFF, aka "Q,"** a convicted felon, drove defendant **ANTOINE PAUL BROWN** to a FFL to take receipt of the firearm purchased on March 17, 2020, and to assist defendant **ANTOINE PAUL BROWN** in purchasing another firearm;
- o. On or about March 24, 2020, in Berkeley County, in the Northern District of West Virginia, defendant **JENNIFER LYNN DICK**, in connection with the acquisition of firearms, that is, a Sig Sauer, Model P220 Scorpion Elite, .45 caliber ACP pistol, SN 37A044933 and a Glock, Model 29, 10mm pistol, SN VHX059, from a FFL, knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearms to defendant **JENNIFER LYNN DICK** under chapter 44 of Title 18, in that the defendant represented she was the actual purchaser of the firearm, when in fact, she was not the true purchaser of the firearm;
- p. On or about March 24, 2020, in Berkeley County, in the Northern District of West Virginia, defendant **TYRONE GREENFIELD, aka "Tidy,"** knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year,

that is, the felony offense of Conspiracy to Distribute and Possession with Intent to Distribute Marijuana, in violation of 21 U.S.C. §§ 841(a)(1) and 846, in the United States District Court of the District of Columbia in case Number 97-260-01, did knowingly possess a Sig Sauer, Model P220 Scorpion Elite, .45 caliber ACP pistol, SN 37A044933 and a Glock, Model 29, 10mm pistol, bearing serial number VHX059, said firearms having been shipped and transported in interstate commerce;

q. other overt acts.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

(False Statement During Purchase of Firearm)

On or about April 11, 2019, in Berkeley County, in the Northern District of West Virginia, defendant **ANTOINE PAUL BROWN**, in connection with the acquisition of a firearm, that is, a Taurus, Model G2C, 9mm pistol, bearing serial number TLY96930, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **ANTOINE PAUL BROWN** under chapter 44 of Title 18, in that the defendant represented he was the actual purchaser of the firearm, when in fact, he was not the true purchaser of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT THREE

(Unlawful Possession of Firearm)

On or about April 11, 2019, in Berkeley County, in the Northern District of West Virginia, defendant **TYRONE GREENFIELD, aka “Tidy,”** knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, that is, the felony offense of Conspiracy to Distribute and Possession with Intent to Distribute Marijuana, in violation of 21 U.S.C. §§ 841(a)(1) and 846, in the United States District Court of the District of Columbia in case Number 97-260-01, did knowingly possess a Taurus, Model G2C, 9mm pistol, bearing serial number TLY96930, said firearm having been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT FOUR

(False Statement During Purchase of Firearms)

On or about April 24, 2019, in Berkeley County, in the Northern District of West Virginia, defendant **ANTOINE PAUL BROWN**, in connection with the acquisition of firearms, that is, a Taurus, Model G2C, 9mm pistol, bearing serial number TMC87419 and a Taurus, Model G2C, .40 caliber pistol, SN SMB50731, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearms to defendant **ANTOINE PAUL BROWN** under chapter 44 of Title 18, in that the defendant represented he was the actual purchaser of the firearms, when in fact, he was not the true purchaser of the firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT FIVE

(False Statement During Purchase of Firearm)

On or about May 13, 2019, in Berkeley County, in the Northern District of West Virginia, defendant **ANTOINE PAUL BROWN**, in connection with the acquisition of a firearm, that is, a Taurus, Model G2C, 9mm pistol, bearing serial number TLW81109, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **ANTOINE PAUL BROWN** under chapter 44 of Title 18, in that the defendant represented he was the actual purchaser of the firearm, when in fact, he was not the true purchaser of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT SIX

(Unlawful Possession of Firearm)

On or about May 13, 2019, in Berkeley County, in the Northern District of West Virginia, defendant **TYRONE GREENFIELD, aka “Tidy,”** knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, that is, the felony offense of Conspiracy to Distribute and Possession with Intent to Distribute Marijuana, in violation of 21 U.S.C. §§ 841(a)(1) and 846, in the United States District Court of the District of Columbia in case Number 97-260-01, did knowingly possess a Taurus, Model G2C, 9mm pistol, bearing serial number TLW81109, said firearm having been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT SEVEN

(False Statement During Purchase of Firearm)

On or about July 23, 2019, in Berkeley County, in the Northern District of West Virginia, defendant **ANTOINE PAUL BROWN**, in connection with the acquisition of a firearm that is a Taurus, Model G2C, 9mm pistol, bearing serial number TMA81872, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **ANTOINE PAUL BROWN** under chapter 44 of Title 18, in that the defendant represented he was the actual purchaser of the firearm, when in fact, he was not the true purchaser of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT EIGHT

(Unlawful Possession of Firearm)

On or about July 23, 2019, in Berkeley County, in the Northern District of West Virginia, defendant **TYRONE GREENFIELD, aka “Tidy,”** knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, that is, the felony offense of Conspiracy to Distribute and Possession with Intent to Distribute Marijuana, in violation of 21 U.S.C. §§ 841(a)(1) and 846, in the United States District Court of the District of Columbia in case Number 97-260-01, did knowingly possess a Taurus, Model G2C, 9mm pistol, bearing serial number TMA81872, said firearm having been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT NINE

(False Statement During Purchase of Firearm)

On or about September 29, 2019, in Berkeley County, in the Northern District of West Virginia, defendant **ANTOINE PAUL BROWN**, in connection with the acquisition of a firearm, that is, a Taurus, Model G2C, 9mm pistol, bearing serial number SMS45201, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **ANTOINE PAUL BROWN** under chapter 44 of Title 18, in that the defendant represented he was the actual purchaser of the firearm, when in fact, he was not the true purchaser of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TEN

(False Statement During Purchase of Firearms)

On or about October 16, 2019, in Berkeley County, in the Northern District of West Virginia, defendant **HOPE JULIA CLEMONS**, in connection with the acquisition of firearms, that is, a Taurus, Model G2C, 9mm pistol, bearing serial number TMS71722, and an Anderson Manufacturing, Model AM-15, .300 caliber blackout, bearing serial number 18164147, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearms to defendant **HOPE JULIA CLEMONS** under chapter 44 of Title 18, in that the defendant represented she was the actual purchaser of the firearm, when in fact, she was not the true purchaser of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT ELEVEN

(False Statement During Purchase of Firearms)

On or about October 17, 2019, in Berkeley County, in the Northern District of West Virginia, defendant **HOPE JULIA CLEMONS**, in connection with the acquisition of firearms, that is, a Taurus, Model G2C, 9mm pistol, bearing serial number TMU05548, and a Taurus, Model G3, 9mm pistol, bearing serial number TMU16862, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearms to defendant **HOPE JULIA CLEMONS** under chapter 44 of Title 18, in that the defendant represented she was the actual purchaser of the firearm, when in fact, she was not the true purchaser of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWELVE

(False Statement During Purchase of Firearm)

On or about February 29, 2020, in Berkeley County, in the Northern District of West Virginia, defendant **ANTOINE PAUL BROWN**, in connection with the acquisition of a firearm that is, a Taurus, Model G3, 9mm pistol, bearing serial number AAM162163, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **ANTOINE PAUL BROWN** under chapter 44 of Title 18, in that the defendant represented he was the actual purchaser of the firearm, when in fact, he was not the true purchaser of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT THIRTEEN

(False Statement During Purchase of Firearm)

On or about March 17, 2020, in Berkeley County, in the Northern District of West Virginia, defendant **ANTOINE PAUL BROWN**, in connection with the acquisition of a firearm, that is, a Taurus, Model G2C, 9mm pistol, bearing serial number TMW8007, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **ANTOINE PAUL BROWN** under chapter 44 of Title 18, in that the defendant represented he was the actual purchaser of the firearm, when in fact, he was not the true purchaser of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT FOURTEEN

(False Statement During Purchase of Firearm)

On or about March 24, 2020, in Berkeley County, in the Northern District of West Virginia, defendant **ANTOINE PAUL BROWN**, in connection with the acquisition of a firearm, that is, a Taurus, Model PT111, 9mm pistol, bearing serial number TWA21487, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **ANTOINE PAUL BROWN** under chapter 44 of Title 18, in that the defendant represented he was the actual purchaser of the firearm, when in fact, he was not the true purchaser of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT FIFTEEN

(False Statement During Purchase of Firearms)

On or about March 24, 2020, in Berkeley County, in the Northern District of West Virginia, defendant **JENNIFER LYNN DICK**, in connection with the acquisition of firearms, that is, a Sig Sauer, Model P220 Scorpion Elite, .45 caliber ACP pistol, bearing serial number 37A044933 and a Glock, Model 29, 10mm pistol, bearing serial number VHX059, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearms to defendant **JENNIFER LYNN DICK** under chapter 44 of Title 18, in that the defendant represented she was the actual purchaser of the firearm, when in fact, she was not the true purchaser of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT SIXTEEN

(Unlawful Possession of Firearm)

On or about March 24, 2020, in Berkeley County, in the Northern District of West Virginia, defendant **TYRONE GREENFIELD, aka “Tidy,”** knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, that is, the felony offense of Conspiracy to Distribute and Possession with Intent to Distribute Marijuana, in violation of 21 U.S.C. §§ 841(a)(1) and 846, in the United States District Court of the District of Columbia in case Number 97-260-01, did knowingly possess a Sig Sauer, Model P220 Scorpion Elite, .45 caliber ACP pistol, bearing serial number 37A044933 and a Glock, Model 29, 10mm pistol, bearing serial number VHX059, said firearms having been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT SEVENTEEN

(Conspiracy to Possess with Intent to Distribute and to Distribute Eutylone)

From on or about June 1, 2019, to December 31, 2020, in Berkeley and Jefferson Counties, in the Northern District of West Virginia, and elsewhere, defendants **TYRONE GREENFIELD, aka “Tidy,” ANTOINE PAUL BROWN, MARCUS PURNELL, aka “Mo,” CHARLES GRANT, JR., BRANDON DALE BENJAMIN, MATTHEW CRIMM, SAMUEL CURTIS TAYLOR, CRAIG ORNDOFF, and SEAN AMOS ROBINSON, aka “Zoo,”** did unlawfully, knowingly, intentionally, and without authority combine, conspire, confederate, agree and have a tacit understanding together with each other, and with persons known and unknown to the Grand Jury to violate Title 21, United States Code, Section 841(a)(1). It was a purpose and object of the conspiracy to possess with intent to distribute, and to distribute a mixture and substance containing a detectable amount of 1-(1,3-Benzodioxol-5-yl)-2-(ethylamino)butan-1-one, also known as Eutylone, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 846, and 841(b)(1)(C).

COUNT EIGHTEEN

(Distribution of Eutylone)

On or about September 23, 2020, in Berkeley County, West Virginia, in the Northern District of West Virginia, defendant **BRANDON DALE BENJAMIN**, did unlawfully, knowingly, intentionally, and without authority distribute a mixture and substance containing a detectable amount of 1-(1,3-Benzodioxol-5-yl)-2-(ethylamino)butan-1-one, also known as Eutylone, a Schedule I controlled substance, in exchange for \$600 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT NINETEEN

(Unlawful Use of Communication Facility)

On or about November 20, 2020, in Berkeley County, in the Northern District of West Virginia, defendants **TYRONE GREENFIELD, aka “Tidy,”** and **MARCUS PURNELL, aka “Mo,”** did knowingly and intentionally use a communication facility in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), as alleged in Count Seventeen of this Indictment, that is, the defendants used a telephone to arrange a distribution of Eutylone; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT TWENTY

(Unlawful Use of Communication Facility)

On or about November 22, 2020, in Berkeley County, in the Northern District of West Virginia, defendants **TYRONE GREENFIELD, aka “Tidy,”** and **SAMUEL CURTIS TAYLOR**, did knowingly and intentionally use a communication facility in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), as alleged in Count Seventeen of this Indictment, that is, the defendants used a telephone to arrange a distribution of Eutylone; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

FORFEITURE ALLEGATION

Controlled Substance Act

Pursuant to Title 21, United States Code, Section 853 and Title 21, United States Code, Section 841(a)(1) and (b)(1)(C), the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any property used, or intended to be used, to commit or to facilitate the commission of the above referenced offense, and any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offense, including, but not limited to a Taurus, Model G2C, 9mm pistol, bearing serial number TMC87419; a Taurus, Model G2C, .40 caliber pistol, bearing serial number SMB50731; a Taurus, Model G2C, 9mm pistol, bearing serial number TLW81109; a Taurus, Model G2C, 9mm pistol, bearing serial number TMW8007; a Taurus, Model PT111, 9mm pistol, bearing serial number TWA21487; a Taurus, Model G2C, 9mm pistol, bearing serial number TLY96930; a Taurus, Model G2C, 9mm pistol, bearing serial number SMS45201; a Taurus, Model G3, 9mm pistol, bearing serial number AAM162163; a Taurus G2C, 9mm pistol, bearing serial number TMA81872; a Taurus, Model G2C, 9mm pistol, bearing serial number TMS71722; an Anderson Manufacturing, Model AM-15, .300 caliber blackout, SN 18164147; a Taurus, G3, 9mm pistol, bearing serial number TMU168621; a Taurus, G2C, 9mm pistol, bearing serial number TMU05548; a Sig Sauer, Model P220 Scorpion Elite, .45 caliber ACP pistol, bearing serial number 37A044933; and a Glock, Model 29, 10mm pistol, bearing serial number VHX059.

Gun Control Act

Pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1), the government will seek the forfeiture of any firearm and any ammunition

involved in or used in any knowing violation of Title 18, United States Code, Sections 922(g)(1), 922(a)(6), and 924(a)(2), including a Taurus, Model G2C, 9mm pistol, bearing serial number TMC87419; a Taurus, Model G2C, .40 caliber pistol, bearing serial number SMB50731; a Taurus, Model G2C, 9mm pistol, bearing serial number TLW81109; a Taurus, Model G2C, 9mm pistol, bearing serial number TMW8007; a Taurus, Model PT111, 9mm pistol, bearing serial number TWA21487; a Taurus, Model G2C, 9mm pistol, bearing serial number TLY96930; a Taurus, Model G2C, 9mm pistol, bearing serial number SMS45201; a Taurus, Model G3, 9mm pistol, bearing serial number AAM162163; a Taurus G2C, 9mm pistol, bearing serial number TMA81872; a Taurus, Model G2C, 9mm pistol, bearing serial number TMS71722; an Anderson Manufacturing, Model AM-15, .300 caliber blackout, SN 18164147; a Taurus, G3, 9mm pistol, bearing serial number TMU16862l; a Taurus, G2C, 9mm pistol, bearing serial number TMU05548; a Sig Sauer, Model P220 Scorpion Elite, .45 caliber ACP pistol, bearing serial number 37A044933; and a Glock, Model 29, 10mm pistol, bearing serial number VHX059.

A true bill,

/s/ _____
Grand Jury Foreperson

/s/ _____
RANDOLPH J. BERNARD
Acting United States Attorney

Lara Ompps-Botteicher
Assistant United States Attorney